

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN, ROBIN  
MATZKE, and BRANDON WILLIAMS,

Defendants.

Adv. Pro. No. 23-50437 (JTD)

**CERTIFICATION OF COUNSEL**

I, Matthew B. McGuire, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. Plaintiffs FTX Trading Ltd. and Maclaurin Investments Ltd.; the Debtors; plaintiff-intervenor the Official Committee of Unsecured Creditors; and Defendants Patrick Gruhn, Robin Matzke, Brandon Williams, and Lorem Ipsum UG (collectively, “Parties”) in the above-captioned adversary proceeding (the “Adversary Proceeding”), by and through their counsel, have entered

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

into the *Confidentiality Agreement and Stipulated Protective Order* (the “Confidentiality Agreement and Protective Order”)<sup>2</sup> to facilitate and expedite the production, exchange, and treatment of Discovery Material to be produced or otherwise disclosed in connection with discovery undertaken during the Adversary Proceeding. A proposed form of the Confidentiality Agreement and Protective Order is attached hereto as **Exhibit 1**.

2. Pursuant to local rule 9018-1(h) of the Local Rules for the United States Bankruptcy Court for the District of Delaware, counsel for the Debtors submitted drafts of the Confidentiality Agreement and Protective Order to counsel for the United States Trustee (the “U.S. Trustee”) for review on November 30, 2023. Thereafter, the U.S. Trustee provided certain comments that were incorporated into the Confidentiality Agreement and Protective Order and has advised that the U.S. Trustee has no objection to entry of the Confidentiality Agreement and Protective Order as attached hereto. In accordance with the Court’s electronic order processing procedures, a copy of the Confidentiality Agreement and Protective Order shall be uploaded to CM/ECF.

3. Accordingly, the Debtors respectfully request that the Court enter the Confidentiality Agreement and Protective Order at its earliest convenience.

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<sup>2</sup> Terms utilized but not otherwise defined herein shall have the same meanings as ascribed to them in the Confidentiality Agreement.

Dated: December 11, 2023  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

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-and-

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*Counsel for the Debtors  
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